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Thursday, 28 August 2014

Re: N71 Muckross Road Traffic Calming Scheme Part 8 and Section 38

Dear Sir / Madam,

I refer to the consultation process in regard to the above scheme.

This submission is being made through the work of the National Cycling Coordinator on behalf of An Taisce and Cyclist.ie, a new position funded under the European Cyclists' Federation Leadership (ECF) Programme 2013-14. See www.ecf.com for more information on the ECF.

The main point of our submission is that while we welcome measures which aim to promote cycling and walking, we think that the scheme design falls well below the quality levels that will prompt a serious shift in walking and cycling levels and, indeed, in road safety conditions. We have discuss our reasons as follows:

1. Absence of collision data, traffic data and rationale for design.

While the Preliminary Appropriate Assessment Screening Report (June 2014) mentions that "[t]he area has been highlighted in the NRA's assessment under HD 15 of the Design Manual for Roads and Bridges as a high collision location and the data analysis has indicated particular issues in relation to vulnerable road users" (page 2), there is no information provided as to the locations,

types or severity of collisions that took place in this area. Nor has any data on existing or projected cycle / pedestrian traffic levels been provided in the report. Such data would help in making final judgement on the most appropriate design of a scheme.

2. Limited extent of scheme

This particular link running from the outskirts of the town (south of the Woodlawn Road / N71 junction) to the Kerry National Park pedestrian / cycle route is long overdue a redesign, but this is really only the easiest section to improve. The other section from the Town Centre to the beginning of this scheme is relatively dangerous for both pedestrians and cyclists (Figures 1 and 2 below) and this needs to be addressed as a matter of urgency.



Figure 1 – The narrow road and heavy traffic volumes including HGV's & coaches create hostile conditions for cyclists. (Photo taken outside of the extent of the zone covered by the scheme and looking outbound from town)



Figure 2 – Left-only general traffic lanes create huge difficulties since cyclists who are intending to proceed straight ahead since they can end up on the inside of left-turning vehicles and especially HGV's (Photo taken outside of the extent of the zone covered by the scheme and looking outbound from town)

3. Absence of measures to calm traffic speeds

While the scheme is referred to as a "Traffic Calming Scheme" there does not appear to be any on-carriageway (vertical) measures on the main road to slow down motorised traffic. If anything (while acknowledging that the main carraigeway is being reduced in width), by taking cyclists off the main carriageway and mixing them with pedestrians on this route, the speeds of motorised traffic are likely to increase. This is then likely to have negative repercussions at the junctions with side roads where cyclists will mix with other traffic. Additionally, one would expect that many cyclists will chose not to use a shared pedestrian - cyclist space (so as not to be mixing with parents pushing buggies or so as to avoid ending up in constricted spaces when vehicles are entering or exiting the many adjacent driveways along the route – see point 7 below), so any increase in motorised speeds will have a negative impact on their safety and perceived safety.

4. 30kph speed limit

There is an opportunity for KCC to introduce a 30kph limit over the course of the scheme – and at the very least, north of the Flesk bridge and into town. This would be a boon for pedestrian / cycle activity in the area, and the tightness of the space available would suggest this is the natural way to go! The following figure is taken from the recently published Design Manual for Urban Roads and Streets (DMURS) showing the benefits of lower speeds.

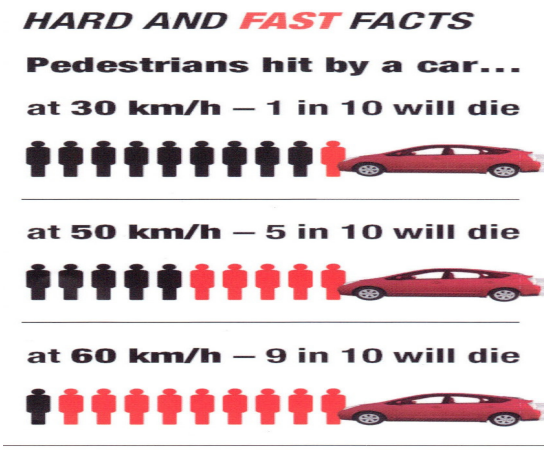


Figure 3 – Outcomes from car impacts with pedestrians as a function of speed

5. Insufficient narrowing of main carriageway lanes

It is noted that a carriageway width of 6.5M is shown. It would be a bigger statement to reduce the carriageway width further to a minimum 6.0M, and then be able to provide more room for cyclists and pedestrians. As a very busy tourist destination and major cycle hire town, there is a high level of bike and pedestrian activity on this route all year round. Therefore, the proposed width of the new facilities are very tight for the large volumes regularly encountered, and particularly where hire bikes are regularly in use.

6. Design of raised junction (Detail B)

Given the high proportion of cycle collisions which occur when left-turning vehicles (and particularly HGVs) cut across cyclists proceeding straight ahead (see for example Dublin City Council, 2009), we are concerned that the detail shown in "DETAIL B" may position cyclists in 'the wrong' space as motor vehicles turn left into this side road. We advise that this detail is revisited and closer reference made to the NTA's National Cycle Manual.



Figure 4 – Existing extremely narrow cycle lane (looking inbound into Killarney)

7. Problems from vehicles exiting from premises onto facility

As shown in Figure 4 above, vehicles exiting from local guest-houses and hotels tend to encroach onto the footway so as to improve their views of traffic coming in both directions. Linking to the previous point, if cyclists are to be directed onto a new widened shared-use path, we have concerns that this may lead to collisions between drivers exiting across the facility and those cyclists travelling at speed – where visibility is poor.

8. Siting of signal controlled pedestrian crossing (chainage 210m)

The reason for the siting of the proposed signal controlled pedestrian cycle crossing at chainage 210M is not immediately clear.

9. Uncontrolled cycle crossing (chainage 580M)

Given that this is a busy road, could this crossing not be signalised? Furthermore it is slightly unclear what the logic was in choosing this location for the crossing.

10. Bicycle parking along the route

It is strongly recommended that the opportunity is seized to introduce plenty of high quality bicycle parking stands at amenities and other attractions next to the proposed facility. Such cycle parking stands will be well received by cycling tourists and by locals. For details of cycle parking planning and design, see Chapter 5 of the National Cycle Manual .

11. Opportunities to link with Green Schools

The Green School Initiative is a highly publicised, student-led initiative operated by An Taisce. Sustainable travel is an integral part of the programme amongst other aspects of sustainable living. Given the number of schools in Killarney town, we would encourage you to assess if the schools are involved in Green Schools and, if so, that an improved cycle route is incorporated into and promoted through the initiative. In this way, it could prove to be an excellent platform to heighten awareness and increase cycle traffic on the proposed route, thus facilitating in its success.

12. The Broader Context for this Scheme – Euro-Velo Routes

The Muckross Road project was highlighted in the 2006 Cork-Kerry Regional Report of the Strategy for the Development of Irish Cycle Tourism produced for Fáilte Ireland and it also forms part of / links to the “Atlantic” Euro Velo Route #1.



Figure 5 – Euro-velo Network. Euro-velo Route #1 “Atlantic Coast” runs from Scandinavia to the Algarve via County Kerry

We expect then that the route could appeal to several different types of users:

- firstly, the cycling visitors and locals wishing to cycle all, or at least a significant length, of the Irish leg of the spectacular EuroVelo "Atlantic Coast" Route #1 – Figure 5 above;
- secondly, (local) recreational riders, including families with young children, who may be less experienced.
- thirdly, cycling commuters and utility cyclists travelling (in particular) to range of destinations along the route so as to access a range of amenities (shops, historic sites, schools, employment centres etc.).

Furthermore, we would hope that the facility will help reduce car local usage in the area thus helping to relieve congestion in Killarney. The amenity could also be used creatively so as to get school children back cycling again and thus developing life-long healthier habits.

Most important of all, the creation of the facility would be a constructive response to the emerging crisis of having a nation of overweight citizens with the associated morbidity costs for a struggling health system.

In Conclusion

We think that the proposed design is insufficiently ambitious in terms of helping to transform Killarney town and environs into a really bicycle friendly town. We look forward to seeing a more radical and considered final designs in due course.

We trust that our commentary will assist Kerry County Council in advancing an effective scheme.

I would be grateful if you could acknowledge receipt of this submission and advise us of any further decisions made in regard to this application.

Yours sincerely,

Damien Ó Tuama,
Cyclist.ie / An Taisce National Cycling Coordinator,

APPENDIX – REFERENCES

Colin Buchanan and Sustrans (2006), 'Cork – Kerry Regional Report of the Strategy for the Development of Irish Cycle Tourism'.

Department of Transport (2009), 'National Cycle Policy Framework' (NCPF), (Department of Transport).

Department of Transport, Tourism and Sport and Department of Environment, Community and Local Government (2013), 'Design Manual for Urban Roads and Streets'.

DUBLIN CITY COUNCIL 2009. Cycle Collisions in Dublin City (2002-06).

European Cyclists' Federation 'Eurovelo - The European cycle route network ', <http://www.eurovelo.com/en/images/eurovelo-map>, accessed 18/July 2013.

National Transport Authority 'National Cycle Manual', <http://www.cyclemanual.ie/>, accessed 16/May 2013.